## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

<u>INFORMATION</u>

- V.-

S3 0.9 Cr. 443 (PKC)

ROBERT SALAMON,

a/k/a "Robert L. Salamon,"

a/k/a "Robert S. Salamon,"

a/k/a "Robert Solomon,"

a/k/a "Sam Salamon,"

Defendant.

COUNT ONE

The United States Attorney charges:

1. From in or about 2004 through in or about May 2008, in the Southern District of New York and elsewhere, ROBERT SALAMON, a/k/a "Robert L. Salamon," a/k/a "Robert S. Salamon," a/k/a "Robert Solomon," a/k/a "Sam Salamon," the defendant, unlawfully, willfully, and knowingly, did make under oath, and as permitted under penalty of perjury under Section 1746 of Title 28. United States Code, and did subscribe as true, a false statement with respect to a material fact in an application, affidavit, and other document required by the immigration laws and regulations prescribed thereunder, and did present such application, affidavit, and other document which contained such false statement and which failed to contain a reasonable basis in law and fact, to wit, SALAMON presented, and aided and abetted the presenting of, applications to immigration authorities that

contained materially false statements and information in order to evade the requirements of federal immigration law and regulations.

(Title 18, United States Code, Sections 1546(a) and 2.)

### FORFEITURE ALLEGATION

2. As the result of committing the immigration fraud offense in violation of 18 U.S.C. § 1546 alleged in Count One of this Information, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(6), all conveyances used in the commission of the violation; all property, real and personal, that constitutes or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the offense; and all property, real or personal, that was used to facilitate, or was intended to be used to facilitate, the commission of the offense, including but not limited to at least \$30,000.00 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the immigration fraud offense alleged in Count One of this Information.

#### SUBSTITUTE ASSETS PROVISION

- 3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

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c. has been placed beyond the jurisdiction of the

Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which

cannot be subdivided without difficulty;

it as the intent of the United States, pursuant to 21 U.S.C.

§ 853(p), to seek forfeiture of any other property of said

defendant up to the value of the above forfeitable property

described above.

(Title 18, United States Code, Section 982(a)(6); Title 21, United States Code, Section 853.)

LEV L. DASSIN

Acting United States Attorney

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Defendant.

### **FELONY INFORMATION**

7/17/2009 S3 09 Cr. 443 (PKC)

Judge Castel

LEV L. DASSIN
Acting U.S. Attorney.